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9 IN THE UNITED STATES DISTRICT COURT
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 REGINALD THOMAS,
15 Defendant.
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CASE NO. 2:20-CR-012-MCE

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: June 12, 2020

TIME: 10:00 a.m.

COURT: Hon. Morrison C. England, Jr.

17 **STIPULATION**

18 Plaintiff United States of America, by and through its counsel of record, and defendant, by and
19 through defendant's counsel of record, hereby stipulate as follows:

- 20 1. By previous order, this matter was set for status on June 11, 2020. Docket 15.
- 21 2. On June 8, 2020, the Court continued the status conference to June 12, 2020. Docket 17.
- 22 3. By this stipulation, defendant now moves to continue the status conference until August
23 6, 2020, and to exclude time between June 11, 2020, and August 6, 2020, under Local Code T4.
- 24 4. The parties agree and stipulate, and request that the Court find the following:
 - 25 a) The government has represented that the discovery associated with this case
26 includes numerous reports and related documents, photographs, audio recordings, and videos.
27 All of this discovery has been either produced directly to counsel and/or made available for
28 inspection and copying.

1 a) Counsel for defendant desires additional time to continue to conduct investigation
2 and research related to the charges, review discovery for this matter, to discuss potential
3 resolutions with his client, and to otherwise prepare for trial.

4 b) Counsel for defendant believes that failure to grant the above-requested
5 continuance would deny him/her the reasonable time necessary for effective preparation, taking
6 into account the exercise of due diligence.

7 c) The government does not object to the continuance.

8 d) Based on the above-stated findings, the ends of justice served by continuing the
9 case as requested outweigh the interest of the public and the defendant in a trial within the
10 original date prescribed by the Speedy Trial Act.

11 e) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
12 et seq., within which trial must commence, the time period of June 12, 2020 to August 6, 2020,
13 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]
14 because it results from a continuance granted by the Court at defendant's request on the basis of
15 the Court's finding that the ends of justice served by taking such action outweigh the best interest
16 of the public and the defendant in a speedy trial.

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5. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: June 8, 2020

McGREGOR W. SCOTT
United States Attorney

/s/ TANYA B. SYED
TANYA B. SYED
Assistant United States Attorney

Dated: June 8, 2020

/s/ OLAF W. HEDBERG
OLAF W. HEDBERG
Counsel for Defendant
REGINALD THOMAS

ORDER

IT IS SO ORDERED.

Dated: June 9, 2020


MORRISON C. ENGLAND, JR.
UNITED STATES DISTRICT JUDGE